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Edmund Polubinski III, Esq. (*pro hac vice* pending)
Mari Grace Byrne, Esq. (*pro hac vice* pending)
Charlotte M. Savino, Esq. (*pro hac vice* pending)
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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SCOTT STERLING, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS,
BELINDA NUCIFORA, DAVID
BARTHOLOMEW, CHRISTOPHER
GUZOWSKI, and MICHAEL ALFRED,

Defendants.

Civil Action No.: 2:22-cv-07273-JMV-MAH

Document Electronically Filed

**DECLARATION OF
SAMUEL I. PORTNOY, ESQ.
IN SUPPORT OF APPLICATION FOR
ADMISSION *PRO HAC VICE* OF
EDMUND POLUBINSKI III, ESQ., MARI
GRACE BYRNE, ESQ., AND
CHARLOTTE M. SAVINO, ESQ.**

I, **SAMUEL I. PORTNOY, ESQ.**, declare, under penalty of perjury, as follows:

1. I am a Director of Gibbons P.C., and I submit this declaration in support of Defendants Iris Energy Limited, Daniel Roberts, William Roberts, Belinda Nucifora, David Bartholomew, Christopher Guzowski, and Michael Alfred (collectively, “Defendants”) application for an Order granting Edmund Polubinski III, Esq., Mari Grace Byrne, Esq., and

Charlotte M. Savino, Esq. admission *pro hac vice* in this matter pursuant to Local Civil Rule 101.1(c). I am personally familiar with the facts set forth in this Declaration.

2. I am a member in good standing of the bars of the State of New Jersey, the State of New York, the United States District Court for the District of New Jersey, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, and the United States Court of Appeals for the Third Circuit.

3. On or about January 24, 2023, Counsel for Plaintiffs consented to the admission *pro hac vice* of Edmund Polubinski III, Esq., Mari Grace Byrne, Esq., and Charlotte M. Savino, Esq. in this matter.

4. If the Court grants Defendants' application for the admission *pro hac vice* of Edmund Polubinski III, Esq., Mari Grace Byrne, Esq., and Charlotte M. Savino, Esq., I or another member of Gibbons P.C. who is a member in good standing of the bars of the State of New Jersey and the United States District Court for the District of New Jersey will continue to serve as counsel of record in this matter, will review and sign all pleadings, briefs, and other papers filed with the Court, will be present for all appearances before the Court unless previously excused from appearing by the Court, will be responsible for the conduct of this action and for the conduct of Edmund Polubinski III, Esq., Mari Grace Byrne, Esq., and Charlotte M. Savino, Esq., and will otherwise comply with all the terms and conditions of Local Civil Rule 101.1(c).

5. For the foregoing reasons and those set forth in the Declarations of Edmund Polubinski III, Esq., Mari Grace Byrne, Esq., and Charlotte M. Savino, Esq., submitted herewith, it is respectfully requested that the Court execute and direct the entry of the attached Order admitting Edmund Polubinski III, Esq., Mari Grace Byrne, Esq., and Charlotte M. Savino, Esq. *pro hac vice* for the purpose of representing Defendants in this litigation.

I declare under penalty of perjury that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Respectfully submitted,

Dated: February 2, 2023
Newark, New Jersey

s/ Samuel I. Portnoy
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